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VIA ELECTRONIC FILING

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: EX PARTE – CC Docket No. 01-277**

Dear Ms. Salas:

On October 19, 2001, I provided the attached written materials to the Department of Justice at the Department's request. The materials concern volume testing of BellSouth's systems being conducted in Florida.

I am filing notice of this ex parte meeting in the docket identified above, as required by Section 1.1206(b)(2) of the Commission's rules. Please associate this notice with the record of that proceeding.

Sincerely,

  
Jon Banks

Attachment

cc: Jessica Rosenworcel  
Susan Pié  
James Davis-Smith (Department of Justice)  
Cynthia Lewis

Florida volume testing has not indicated any problems with BellSouth's system capacity to handle orders. KPMG identified certain orders that did not flow through the systems as they expected but fell for manual processing. The flow-through problems encountered during KPMG's testing were due to defects that have been corrected.

1. Performance data indicates that BellSouth is handling today's order volumes in a fully satisfactory fashion. For example, see the attached Georgia and Louisiana Monthly State Summary reports for FOC, Reject Interval and Acknowledgement Timeliness and Completeness volumes and results for the Fully Mechanized, Non-Mechanized and Partially Mechanized categories. (See LA\_Aug-01.xls and GA\_Aug-01.xls).
2. The Georgia third party volume tests were conducted in BellSouth's RSIMMS test environment using end of year 2001 projected levels as they were forecast in mid-2000. Additionally, KPMG successfully tested BellSouth's ENCORE production environment at its stated capacity level in mid-2000. The results of the Normal, Peak and Capacity volume tests for the Georgia tests can be seen in the table in the attached Volume table (Volume.xls). The fourth row in the table provides the daily load that BellSouth's ENCORE production environment is currently experiencing. The fifth row in the table is the projected forecasted volume for June 2002 that was used for the first volume test of the Florida Test. The sixth row in the table is the actual number of transactions that occurred during the first day of the Florida volume test on August 16, 2001.
3. It is true that KPMG did issue four exceptions associated with its first attempt at a Florida mechanized ordering volume test. However, in the final analysis none of these exceptions pointed to a finding of system capacity limitations. Each exception is detailed below.

Exception 108 was issued for TAG pre-order response timeliness. However, KPMG determined that they had used the wrong timestamps in their assessment of the response timeliness and they subsequently withdrew the exception.

Exception 99 was issued by KPMG when it did not receive the mechanized responses it expected for certain orders it submitted electronically via the BellSouth Electronic Data Interchange (EDI) interface. BellSouth's investigation of the submitted orders determined that all in question fell out for manual handling.

Specifically, BellSouth's investigation of the 30 orders identified in this exception showed the following:

- 13 related to a new defect (due date calculation problem occurring due to specific sequencing of Directory and Services information on order). This defect, which was fixed on 09/08/01,

had not been previously observed and is unique to KPMG orders.

- 9 related to an existing defect (LESOG unable to validate central office addresses in RSAG for certain NPA-NXX codes). This defect was corrected on 09/29/01
- The remaining orders fell out due to transient system problems, and KPMG data problems.

All issues have been resolved and KPMG is ready to re-test.

Exception 104 was issued because KPMG believed that it was not receiving timely responses for certain the pre-order queries submitted via the (RoboTAG) web .

However, KPMG has determined that it had submitted an inappropriate pre-order volume of such queries for the RoboTAG interface. KPMG has now re-forecast their pre-order transaction levels for each of the specific query type and is closing this exception.

Exception 107 was issued when KPMG did not receive mechanized responses for certain Local Service Requests (LSRs) that it submitted Bellsouth's Telecommunications Access Gateway (TAG) interface.

BellSouth's investigation determined that all 3 LSRs in fell out for manual handling. Two of the LSRs fell out due to the LESOG central office address validation problem discussed above and one fell out due to a KPMG data problem.

All issues have been resolved and KPMG is ready to re-test.

Row No.	Description	Pre-Order Volume/Day	Order Volume/Day	Status
1	GA Normal test (RSIMMS)	118,000	35,000	Passed
2	GA Peak Test (RSIMMS)	147,000	43,000	Passed
3	GA Production Capacity (ENCORE)	73,400	21,600	Passed
4	Current Daily Load	61,600	17,600	
5	Forecasted Normal Load per FL Test	138,446	39,556	
6	FL Normal Test	93,888	26,825	